

Torres, Roberto

From: SCHMIDT, Larry (ANQAP) <lschmidt@colaska.com>
Sent: Tuesday, August 13, 2019 2:10 PM
To: Torres, Roberto
Subject: [External_Sender] RE: NRC request for additional information
Attachments: NRC license 50-29386-01 renewal additional information 8.09.2019.pdf

Hello Roberto:

I have attached our signed response to the additional information that you requested for the renewal application of NRC license 50-29386-01. Please let me know if you need any additional information.

Thank you,



Lawrence J. Schmidt
Quality Control Manager
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From: Torres, Roberto <RobertoJ.Torres@nrc.gov>
Sent: Thursday, August 8, 2019 8:08 AM
To: SCHMIDT, Larry (ANQAP) <lschmidt@colaska.com>
Subject: NRC request for additional information

Message sent from Internet with prvs=116840a96=RobertoJ.Torres@nrc.gov email address

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Mr. Schmidt, Quality Control Manager and Radiation Safety Officer:

The NRC has completed the technical review of QAP's license renewal application and three items need clarification before proceeding to renew the license. Please provide your response in a signed and dated letter by reply email as a pdf file. There is no need to send the response in hard copy via regular mail if you submit your response via email.

1. QAP's response to Item 8.10.3 – "Material Receipt and Accountability," has incomplete language (missing text is shown underlined). Provide the following complete response (commitment) to Item 8.10.3.

"Physical inventories will be conducted every 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license. We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times."

2. QAP's response to Item 8.10.4 – "Occupational Dose," contains two options to select from and it is an "OR" statement. Option 1 is for QAP to maintain documentation (mathematical calculation) demonstrating that unmonitored individuals (gauge users) are not going to received more than 500 millirem in a year. Option 2 is that QAP will provide and require the use of dosimeters for gauge users. In the renewal application QAP responded that both Options 1 and 2 are being done. Provide one of the following response (commitment).

"We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a)."

OR

"We will provide and require the use of individual monitoring devices (dosimetry). All personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor."

3. QAP's response to Item 8.10.8 – "Maintenance," contains a commitment regarding "Routine Cleaning and Lubrication" but does not contain a commitment regarding "Nonroutine Maintenance". Provide the following response (commitment) to Item 8.10.8 for "Nonroutine Maintenance".

"Nonroutine Maintenance: The gauge manufacturer or other person licensed by the NRC or an Agreement State will perform nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge."

If QAP wants authorization to perform nonroutine maintenance or repair operations that require detaching the source or source rod from a gauge, then QAP needs to develop procedures in accordance with Appendix F of NUREG-1556, Volume 1, Revision 2, and submit to the NRC for review and approval.

Thank you for your cooperation.

Roberto J. Torres, M.S.
Senior Health Physicist
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817-200-1189



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August 9, 2019

NUCLEAR MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511
Roberto J. Torres, M. S. (Senior Health Physicist)

RE: NRC FORM 313 LICENSE RENEWAL APPLICATION FOR LICENSE 50-29386-01
Reply to Request for additional information dated August 8, 2019

To whom it may concern:

1.) Item 8.10.3

"Physical Inventories will be conducted every 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license. We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times."

2.) Item 8.10.4 - Occupational Dose

"We will provide and require the use of individual monitoring devices (dosimetry). All personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor."

3.) Item 8.10.8 - "Maintenance"

We wish to add the following statement for "Nonroutine Maintenance: The gauge manufacturer or other person licensed by the NRC or an Agreement State will perform nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge."

Sincerely,

Todd Porter
General Manager, QAP

Lawrence J. Schmidt
QAP
Radiation Safety Officer